

### III. REMARKS

Claims 1-17 are pending in this application. By this amendment, claims 1, 9 and 10 have been amended, and claim 11 is cancelled. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Furthermore, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is requested.

Entry of this Amendment is proper under 37 C.F.R. §1.116(b) because the Amendment: (a) places the application in condition for allowance as discussed below; (b) does not raise any new issues requiring further search and/or consideration; and (c) places the application in better form for appeal. Accordingly, Applicants respectfully request entry of this Amendment.

In the Office Action, claims 1-17 are rejected under 35 U.S.C. 102(b) as allegedly being clearly anticipated by Khoyi *et al.* (US Patent No. 5,303,379), hereinafter “Khoyi.” Applicants respectfully submit that the claimed invention is allowable for at least the reasons stated below.

With respect to claim 1, Applicants submit that Khoyi does not disclose, *inter alia*, “importing the plurality of source text files into the spreadsheet file after the crating the source-format link; creating a location link between the imported plurality of source text files and their locations into the spreadsheet file after the importing”. *See* claim 1, and similarly in independent claims 9 and 10. Contrary to the Examiner’s assertion, Khoyi only speaks to a linking mechanism for linking data between objects (*see* Title; claim preambles) and not to an importation. That is, the linking that is used in Khoyi, as defined in Khoyi, does not include an importation of source text file *into* the spreadsheet file. (emphasis added)

The definition of linking, in Khoyi, can be found at col. 3, lines 52 – 64. “This linking of data from a child object to a parent object is distinct from the copying of data from one object to another in that the data which is linked *remains a part of the child object rather than becoming an integral part of the parent object.*” (emphasis added). Clearly, there is no importation of objects, nor of source text files, in that the objects, in Khoyi are merely linked and yet remain residing as child objects.

The Office alleges, in the “Response to Arguments” section of the Action, that Khoyi teach the “importation of objects and that the linking of the objects as child files manifest the data in the parent files.” Further the Office states: “[l]inking makes data from a child object appear in a parent object.” Finally, the Office cites Khoyi at column 35, lines 3-4 stating “IMPORT: (optional) take an existing file an make it into an object.” Office Action, page 11. Applicants acknowledge the Office’s statements, yet respectfully contend that while the cited quotations to Khoyi may be accurate, Khoyi still does not teach each and every aspect of the present invention, as is required under 102(b).

For example, Khoyi does not import source text files of any type. Khoyi, as its title suggest merely links objects. As Khoyi defines “objects”, they are clearly not source text files. “The present invention involves the manipulation of typed objects. Different objects are designed to **represent** different forms of information, such as the following. Document objects **represent** text and associated formatting instructions. Spreadsheet objects **represent** mathematical modeling information.” (emphasis added)(Col. 13, lines 33-38). Further, the Office’s statement (*see above*) regarding linking making data from a child object “appear” in a parent object, accentuates the point Applicants are contending, namely that the child objects are

**not *de facto*** imported, but merely linked. Finally, the quotation of the above “IMPORT” step, also accentuates the aforementioned difference between “files” (e.g., source text files) and “objects”. As the Khoyi definition of “IMPORT” states, an existing file is made *into* an object. Clearly, “object” and “files” cannot be synonymous in Khoyi or else the definition of “IMPORT” in Khoyi would be surplusage. The term “import” in Khoyi is not that same as importing a plurality of source text files into the spreadsheet file after the creating of the source-format link, as in the claimed invention.

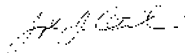
In view of the foregoing, Khoyi does not anticipate the current invention. Accordingly, Applicants respectfully request withdrawal of the rejections. Similarly, independent claims 9 and 10 are believe allowable for the same reasons stated above.

Dependent claims 2-8 and 11-17 are believed allowable for the same reasons stated above, as well as for their own additional features.

#### IV. CONCLUSION

Applicants respectfully submit that the application is in condition for allowance. Should the Examiner believe that anything further is necessary to place the application in better condition for allowance, the Examiner is requested to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,



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Date: July 10, 2006

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